

REMARKS

In accordance with the foregoing, claims 1, 6, and 9 have been amended. Claims 1-13 are pending and under consideration.

Claims 1-3, 6 and 7 remain rejected under 35 U.S.C. §102(e) as being anticipated by Chadha (US 6,061,698).

Claim 4 remains rejected under 35 U.S.C. §103(a) as being unpatentable over Chadha and further in view of Hobbs (US 6,523,022).

Claim 5 and 8 remain rejected under 35 U.S.C. §103(a) as being unpatentable over Chadha and further in view of Homer et al., "Instant HTML", copyright 1997, pages 76-107.

Claims 9-12 remain rejected under 35 U.S.C. §103(a) as being unpatentable over Chadha and further in view of Popp et al. (US 2002/0133637 A1).

Claim 13 remains rejected under 35 U.S.C. §103(a) as being unpatentable over Chadha in view of Popp and further in view of Homer et al., "Instant HTML", copyright 1997, pages 76-107.

On page 3 of the Office Action, the Examiner indicates that Applicants' memory device corresponds to a visual tool 10 in Chadha (US 6,061,698). Applicants respectfully traverse. Chadha's visual tool 10 is simply a tool for manually producing documents by users. It is not a memory device at all.

Furthermore, in Chadha, script files having dynamic data fetch commands are predefined by a tool. In Chadha, a linked document file is produced from an original document (preliminary markup document) including special tags by adding, at the place identified by the tags, the selected linkage identifier for a desired script, by tool. A final document is produced by merging the script file with the linked document 50 using the linkage identifier. Then, the script file, embedded in the final document, is executed by a program to fetch data from a database, whereby a final modified document having desired dynamic data is produced. This means that, in Chadha, the way of modifying the document to make a final modified document is determined by the linkage identifier (or dynamic data fetch command included in the script file) or the place where the linkage identifier is added. In other words, in Chadha, the way of modifying the document to make a final modified document is determined by at least three programs, that is, a program to make the linked document file (a program to identify the special tags), a program to make the final document (the merged document), and the script file itself.

In contrast, in the present invention, such kinds of instructions are not embedded in an original document. In other words, an original document is separated from a program which defines how to make a modified document. This feature is explicitly recited in currently amended claims 1 and 6, for example, by the language, “receiving an instruction from outside other than from the original document.” Assuming *arugendo* that the original document recited in the claims corresponds to the final document having a script file embedded therein in Chadha, the final modified document recited in the claims does not correspond to the linked document file in Chadha. Furthermore, even if one assumes that the final modified document recited in Applicants’ claims corresponds to the linked document file in Chadha, the final modified document is produced automatically by a program in the present invention (as indicated by the claim language, “causing the document modifying apparatus to *automatically modify* said identified one or more areas”) while the linked document file is produced manually by a tool in Chadha (see Chadha, steps 44 and 45, user’s selection of the linkage identifier).

According to the present invention, the way of modifying the document to make a final modified document is determined by a program separate from the original document. As a result, the original document and the program can be configured and managed separately. This provides a significant advantage because skills for producing the two items are completely different. Furthermore, according to the present invention, reconfiguring the program suffices, even if the way to make a modified document must be changed. To the contrary, in Chadha, in order to make a modified document, many procedures, such as selecting a linkage identifier, changing the place where the linkage identifier is added, and reconfiguring the script file, are necessary.

Hobbs is directed to a method of selecting multimedia video information, for example, and for linking the multimedia information across the Internet. Hobbs merely discloses the use of a markup language document and does not disclose or suggest receiving an instruction from outside other than from the original document, as identified by the language of claim 1, for example, of the present invention. Therefore claim 4 via claim 1 is patentable over Chadha in view of Hobbs, as neither Chadha nor Hobbs, taken alone or in combination, teaches or suggests the above-identified feature of the claims of the present invention.

Homer simply describes various HTML commands and does not teach or suggest the above-quoted feature of claim 1. Therefore, claims 5 and 8 via claims 1 and 6, respectively, are patentable over Chadha and further in view of Homer, as neither Chadha nor Homer, taken alone or in combination, teaches or suggests the above-identified feature of the claims of the

present invention.

Popp is directed to a method and apparatus for generating object-oriented world wide web pages. According to Popp, a parsing routine is used at HTML document generation time to retrieve HTML element information. Popp does not disclose, "receiving an instruction from outside other than from the original document," as identified by the language of independent claim 9. Therefore, claim 9 is patentable over Chadha in view of Popp, as neither Chadha nor Popp, taken alone or in combination, teaches or suggests the above-identified feature of the present invention. As claims 10-12 depend from independent claim 9, claims 10-12 are patentable over the references for at least the reasons presented above for claims 1 and 6 (claim 9 recites language similar to that of claims 1 and 6, in relevant part).

As claim 13 depends from independent claim 9, claim 13 is patentable over the references, as none of the references, taken alone or in combination, teach or suggest the above-identified feature of claim 13 via claim 9.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this Amendment, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: 5 JUL 05

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